

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO 1/33

~ WESTERN DIVISION ~

JEREMY P. GALLANT

CASE:

1:16-CV-487

NO. 624-283 ~ S.O.C.F.

P.O. Box 45699

LUCASVILLE, OH 45699

JANUARY 31 2017

SCIOTO COUNTY, OHIO

V.

HONORABLE

ANTHONY CADOGAN

ET AL

DEFENDANTS

JUDGE BARNETT

OF JUDGE LITVIN

VERIFIED AMENDED COMPLAINT

PETITION FOR MONETARY INJUNCTION RELIEF

~ CONSTITUTIONAL ASSERTIONS ~

Respectfully:

I. NOW COMES PLAINTIFF,

JEREMY P. GALLANT, PROCEEDING PRO-SE IN CIVIL ACTION, CASE NO. 1:16-CV-487 GALLANT V. CADOGAN, RESPECTFULLY SUBMITTING A VERIFIED AMENDED COMPLAINT, AS A REVISED ADDITION TO THE ORIGINAL PLEADINGS.

II. PLAINTIFF, A PRO-SE LITIGANT AND INDIGENT WARD OF THE STATE OF OHIO'S DEPARTMENT OF REHABILITATION AND CORRECTIONS (O.D.R.C.), COMES BEFORE THE MOST HONORABLE UNITED STATES DISTRICT COURTS, TO SUBMIT A AMENDED REVISION IN THE CIVIL ASSERTIONS SET FORTH IN THE COMPLAINTS INSCRIPTIONS. PLAINTIFF SUBMITS SUCH PLEADINGS IN THE DISTRICT COURT WITH THE PRESIDING FEDERAL AUTHORITY'S PERMISSION AND IN ACCORDANCE WITH FED. R. CIV. P. RULE 15, REQUESTING THAT THE JUDICIAL DISCRETIONS AND LEGAL ANALYSIS BE APPLIED ACCORDINGLY.

III. PLAINTIFF, PURSUANT TO 42 U.S.C. § 1983, RAISES A CLAIM FOR LEGAL REDRESS FOR THE CONSTITUTIONAL VIOLATIONS AND DEPRIVATIONS OCCURRING AT THE SOUTHERN OHIO CORRECTIONAL FACILITY. PURSUANT TO 28 U.S.C. § 1391(b)(2) THIS COURT MAINTAINS JUDICIAL JURISDICTIONS IN THE ~

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~ III ~ CIVIL AFFAIR BEFORE US, DUE TO ALL OF THE EVENTS, OMISSIONS, AND UNCONSTITUTIONAL TRANSGRESSIONS GIVING RISE TO THE CIVIL PURSUIT TRANSPERING WITHIN THE DISTRICT'S VENUE OF LAW.

~ PROSPECTIVE DEFENDANTS ~
 INTENDED PARTIES TO BE HELD ACCOUNTABLE OFFICIALLY AND INDIVIDUALLY RESPONSIBLE

I all parties listed are in fact responsible for the constitutional violations and deprivations, either by directly committing and/or consciously allowing the infractions as condoning culprits and authorizing accomplices to the unconstitutional perpetrations all responsible state officials, able to be identified are listed below. PLAINTIFF includes 10 JON JANE DOES listing in order to reserve positions for the unidentified culprits. all parties are to be held in both individual and official capacities for the constitutional assertions...

- I. Mr. Anthony Capogano ~ Deputy Warden
- II. Francis Glover ~ Chief Medical Officer
- III. Mr. Cook ~ Deputy Warden
- IV. Mr. Whitman ~ Mail Supervisor
- V. Mr. Frazie ~ Mail Supervisor
- VI. Mr. Mead ~ Mail Attendant
- VII. Mr. Satterfield ~ Mail Attendant
- VIII. Ms. Marshall ~ Inspector
- IX. Mr. Wilson ~ Chief Inspector
- X. Mr. Hunyadi ~ Chief Inspector
- XI. 10 JON JANE DOES ~ (PENDING JOINER)

II. all parties listed are to be held as defendant for the unconstitutional transgressions either by direct actions or indirect participations, and are to be held accountable in the civil assertions...

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B. - EXHAUSTION OF STATE REMEDY

I, JEREMY P. GALLANT, a pro-se litigant and plaintiff in Case, pursuant to 28 U.S.C. § 1746, do declare under pains and penalties of perjury that the foregoing statement is true and correct. I, JEREMY P. GALLANT do hereby swear and affirm that before initiating this civil claim, I first sought to utilize and exhaust all available state remedies as federally required. This I do swear and affirm.

II. PLAINTIFF

MUST FOREWARN THE PRESIDING FEDERAL AUTHORITY THAT WHILE IN SOME INSTANCES THE LITIGANT WAS IN FACT SUCCESSFUL IN ACHIEVING EXHAUSTION, IN OTHERS PLAINTIFF WAS UNABLE, AS THE STATE WERE RENDERED FUNDAMENTALLY UNAVAILABLE BY LISTED DEFENDANTS, AS ASSERTED IN SECTION D OF THE COMPLAINT. THESE CONSTITUTIONAL DEPRIVATIONS ARE IN DIRECT VIOLATION OF PLAINTIFFS RIGHTS, AS THESE INFRACTIONS UNLAWFULLY PREVENTS THE PRO-SE LITIGANT FROM COMPLYING WITH CERTAIN FEDERAL REQUIREMENTS.

C. CONSTITUTIONAL ASSERTIONS

BASIC INSCRIPTIONS OF COMPLAINT

1. PLAINTIFF HAS CONSTRUCTED A SECTIONALIZED FORMAT WITH THE COMPLAINTS ASSERTIONS. THE COMPLAINT CONTAINS INDIVIDUAL SEGMENTS ACCORDING TO THE CONSTITUTIONAL COMPONENTS INVOLVED.

7. PREJUDICIAL PERJURY - DEFRAUDATION OF CHARACTER -

1. THIS SECTION OF THE COMPLAINTS ASSERTIONS INVOLVE DEFENDANT FAISAL AHMEDS ACTS OF UNLAWFUL PERJURY AND RETALIATORY FABRICATIONS SET IN PLACE IN BOTH MEDICAL COMPOSITIONS AND LEGAL DOCUMENTS FOR LITIGATIONS IN THIS COURT (CASE 1:14-cv-199 GALLANT v. AHMED).

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II. PLAINTIFF MUST INSIST, THAT IF THE PRESIDING FEDERAL AUTHORITY WILL PLEASE MAKE JUDICIAL REFERENCE TO CIVIL CASE 1:14-CV-199, GALLANT V. GHODE, WHICH WAS INITIATED IN THESE CHAMBERS. THE LISTED DEFENDANT, FAISAL GHODE WAS THE MAIN DEFENDANT, AND THE MAIN CULPIT TO THE UNCONSTITUTIONAL TRANSGRESSIONS AS TRANSCRIBED.

III. DEFENDANT FAISAL GHODE, ON OR ABOUT DECEMBER, 21, 2015, THROUGH DEFENSE COUNSEL, did INFACT FILE A TWO PAGE DECLARATION IN THIS COURT, IN SUPPORT OF A MOTION FOR SUMMARY JUDGEMENT - (SEE CASE 1:14-CV-199 Doc 165-5 pg 1747)

IV. DEFENDANT FAISAL GHODE'S TWO PAGE DECLARATION INCLUDE 15 PARAGRAPHS THAT CONTAIN PREJUDICIAL FABRICATIONS AND DEFAMATORY CONCEPTIONS, WHICH CONSTITUTE PERJURY IN A COURT OF LAW.

V. PLAINTIFF, UPON DISCOVERING THE DEFENDANT'S PREJUDICIAL PERJURY SET-IN-PLACE WITHIN THE TWO PAGE DECLARATION - (Doc 165-5) did INFACT NOTIFY THE COURTS OF THE DEFAMATORY RECITINGS, SUBMITTING VERIFICATION TO SHOW THE FRAUDULENT FABRICATIONS. - (PLEASE SEE CASE 1:14-CV-199 - Doc NO 170 Filed 12/30/2015 & Doc 175 Filed 2/4/2016)

VI. DEFENDANT FAISAL GHODE did INFACT STRATEGICALLY CONSTRUCT THIS SLANDEROUS FABRICATIONS BY COMMITTING BLATANT ACTS OF PERJURY, WHICH IN TURN, RESULTED IN THE TERMINATION OF THE PLAINTIFF'S CIVIL CASE.

VII. THE EXTENT OF DEFENDANT FAISAL GHODE'S PREJUDICIAL PERJURY INCLUDE BUT IS NOT LIMITED TO THE CALCULATED AND DECEITFULLY DEFAMATION OF CHARACTER BY FAISAL GHODE'S ASSASSINATIONS AND FABRICATIONS, PORTRAYING PLAINTIFF AS MALIGNERING, AND ONLY SEEKING INTOXICATING GAINS, ALL SET-IN-PLACE TO JUSTIFY THE MEDICAL DELIBERATE INDIFFERENCE.

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VIII. DEFENDANT FAISAL WHOEDS ENTIRE TWO PAGE DECLARATION IS BASED UPON A FRAUDULENT STRUCTURE OF DESIGN, AND CONTAINS FABRICATIONS, FALSIFICATIONS, AND DECEITFULLY CONCEIVED CONCOCTIONS, INTRODUCED TO SABOTAGE PLAINTIFFS CIVIL CASE AND JUSTIFY SUMMARY JUDGEMENT, CONSTITUTING PERJURY AND RESULTING IN THE PLAINTIFF SUFFERING CONSTITUTIONAL DEPRIVATIONS...

IX. IN PARTICULAR, ONE OUT OF DEFENDANT FAISAL WHOEDS IS PARAGRAPH "ON AUGUST 6" 2013, DURING A DOCTOR SICK CALL VISIT INMATE GALLANT ADVISED ME THAT HE WOULD COMMIT SUICIDE IF I DID NOT PRESCRIBE HIM NARCOTIC MEDICATION." I INFORMED INMATE GALLANT THAT NEITHER THE X-RAY NOR CT SCAN OF HIS BACK DEMONSTRATED ANY ANOMALY THAT WOULD JUSTIFY PRESCRIBING ANY SYNTHETIC NARCOTIC MEDICATION. "IN ADDITION I - NOTIFIED SECURITY TO PLACE INMATE GALLANT ON SUICIDE WATCH." - THIS ENTIRE ENTRY IS FALSE, AND CONSTITUTES ONE OF THE MORE SEVERE ACTS OF PERJURY.

X. DEFENDANT FAISAL WHOEDS PREJUDICIAL FABRICATIONS ARE MANY, AND WERE NOT ONLY INTRODUCED IN CIVIL LITIGATIONS, BUT ALSO THESE FRAUDULENT DECEITINGS EXTEND TO PLAINTIFFS MEDICAL RECORDS, AND CONTINUE TO HUNT PLAINTIFF WITH OTHER MEDICAL PROFESSIONALS.

XI. PLAINTIFF MUST PETITION THE DISTRICT COURTS TO APPLY ITS DISCERNING INTERPRETATIONS AND JUDICIAL ANALYSIS TO THESE DELIBERATE INFRACTIONS AS A MATTER OF JUST COURSE OF CONSTITUTIONAL LAW... PLAINTIFF THEREFORE ASKS THE COURTS TO ISSUE JUDICIAL ORDERS AS SEEN JUST, FAIR, AND APPROPRIATE, IN REGARDS TO THE DEFENDANTS SLANDEROUS DEFECTION AND PREJUDICIAL PERJURY, ORDERING THE SUBTRACTION OF ALL ENTRIES AND INSERT...

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B.I. ACTS OF RETALIATIONS UNNECESSARY USE OF FORCE

I. PLAINTIFF UPON SUBMITTING THE VERY FIRST CIVIL COMPLAINT, (WHICH WAS OBSTRUCTED - WAS ASSERTED IN SEC. E "U.S. MAIL OBSTRUCTION - ACT 23") INITIATED A HUNGER STRIKE TO PEACEFULLY ALL CONSTITUTIONAL DEPRIVATIONS AND WHAT CASE ENTAILS. ONCE AGAIN, PLAINTIFF ENCOUNTERS A BARRAGE OF STATE EMPLOYEE RETALIATIONS, ALL BEING COMMITTED IN DIRECT RESPONSE TO PLAINTIFFS PROTECTED ACTIONS. THIS PARTICULAR INCIDENT INVOLVES A VERY BRUTAL UNNECESSARY USE OF FORCE, WHICH TRANSPIRED DURING THE COURSE OF PLAINTIFFS HUNGER STRIKE AND CONSIST OF VIOLATIONS OF FIRST, EIGHTH AND FOURTEENTH AMENDMENTS TO THE CONSTITUTION. ALL INSCRIPTIONS WITHIN CONTAIN MATTERS OF SOUND TRUTH AND FACTUAL RECITINGS AS ENCOUNTERED.

II. ON DECEMBER, 12TH, 2015, AT SOUTHERN OHIO CORRECTION FACILITY, HOUSING UNIT K-4, CELL 2, PLAINTIFF WAS CONDUCTING A HUNGER STRIKE TO PEACEFULLY PROTEST UNCONSTITUTIONAL TRANSGRESSIONS.

III. S.O.C.F. HOUSING UNIT K-4 CELL 02, IS A OBSERVATION CELL WITH A LEXION CASE (PLEXI GLASS FRONT COVER) AND IS STATION INFRONT OF A VIDEO SURVEILLANCE SYSTEM, WHICH PROVIDES A FRONTAL POSITION IN VIEWING. THIS ENTIRE INCIDENT IS RECORDED.

IV. ON DECEMBER, 12TH, 2015, AT OR AROUND 8:00 P.M., PLAINTIFF, DUE TO HUNGER STRIKE WAS OVERCOME WITH A SEVERE CASE OF LOW BLOOD SUGAR. PLAINTIFF MADE SEVERAL ATTEMPTS AT OBTAINING ASSISTANCE.

V. AFTER SEVERAL ATTEMPTS GOING DISREGARDED PLAINTIFF WAS SUPPLIED FEED PROVISIONS BY A FELLOW PRISONER, WHICH CONSISTED OF 2 BROWN BAGS CONTAIN P.B. SANDWICHES.

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VI. IT WAS AT THIS TIME THAT MY OFFICERS ~ BURTON & JON DOE ~ ARRIVED AT THE LOCATION, IN RESPONSE TO PLAINTIFF RECEIVING FOOD PROVISIONS. THESE OFFICERS MADE HOSTILE DEMANDS FOR THE FOOD PROVISIONS IN A VERY THREATENING MANNER.

VII. PLAINTIFF MADE ATTEMPTS AT EXPLAINING TO RESPONDING OFFICERS THAT PLAINTIFF WISH TO TERMINATE THE HUNGER STRIKE BY CONSUMING THE FOOD RATIONS, DUE TO LOW BLOOD SUGAR.

VIII. THE RESPONDING OFFICERS BECAME AGGRESSIVELY ANTAGONISTIC AND VERBALLY ABUSIVE ISSUING THREATENING DEMANDS. PLAINTIFF OUT OF FEAR AND INTIMIDATION, REQUESTED A SHIFT CAPTAIN AND MEDICAL OFFICIAL BE SUMMONED.

IX. OFFICERS REFUSED AND ONCE AGAIN ISSUED THREATENING DEMANDS FOR PLAINTIFF'S FOOD PROVISIONS IN A COMBATIVELY DISGRUNTLE TONE. PLAINTIFF GAVE ONE OF TWO BROWN BAGS CONTAINING FOOD RATIONS AND MADE ATTEMPTS AT CONCEALING THE SECOND BAG.

X. THE OFFICERS MADE DISCOVERY OF THE ACT OF DESPERATE CONCEALMENT OF FOOD PROVISIONS AND ONCE AGAIN ISSUED THREATENING DEMANDS. PLAINTIFF REQUESTED SHIFT CAPTAIN, BUT WAS REFUSED.

XI. AT THIS TIME, DUE TO OFFICERS VERY THREATENING TONE, PLAINTIFF TURNED TO FACE THE BACK OF THE CELL AND PUT HANDS OVER HEAD. IT WAS THEN THAT OFFICERS UNLAWFULLY ADMINISTERED A BRUTAL UNNECESSARY USE OF FORCE, BY MALICIOUSLY SPRAYING O.C. CHEMICAL GEL OVER PLAINTIFF'S PERSONS, CAUSING AN UNBEARABLE AMOUNT OF EXCRUCIATING PAINS AND EMOTIONAL TURMOILS OF SUFFERINGS.

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xii. PLAINTIFF, ON THIS VERY DAY, DECEMBER, 12TH 2015, SUFFERED GROSSLY UNCONSTITUTIONAL INFLICTIONS IN A SAVAGELY CRUEL AND INHUMAN FASHION, COMMITTED ON A VERY VINDICTIVE, RETALIATORY PRETENSE INDIRECT VIOLATION OF THE FIRST AND EIGHTH AMENDMENTS TO THE CONSTITUTION.

xiii. THIS ENTIRE INCIDENT IS RECORDED BY VIDEO SURVEILLANCE, AND UPON REVIEW WILL VERIFY ALL RECORDINGS INSCRIBED.

xiv. FURTHERMORE, PLAINTIFF WAS DEPRIVED OF 14TH AMENDMENT RIGHTS BY BEING DENIED DUE PROCESS, AS OFFICERS FRAUDULENTLY REPORTED PLAINTIFF DURING THE INCIDENT, SPIT ON OFFICERS, WHICH IS FALSE.

xv. OFFICERS BURTON AND JON DOE FABRICATED RULE INFRACTIONS IN A CONSPIRED MANNER, TO HIDE IN JUSTIFYING THE UNLAWFUL AND UNNECESSARY USE OF FORCE.

xvi. PLAINTIFF WAS DENIED ALL DUE PROCESS AND PROCEDURAL RIGHTS IN THE FABRICATED RULE INFRACTIONS BY BEING INDUCED TO PLEAD GUILTY BY THREAT OF FURTHER PUNISHMENTS AND PRIVILEGE LOSS, WHEN INFECT PLAINTIFF WAS INNOCENT OF SUCH CONDUCT.

xvii. PLAINTIFF, DUE TO DEFENDANTS AND RESPONSIBLE STATE OFFICIALS UNLAWFUL ACTIONS AND UNETHICAL BEHAVIORS SUFFERED CONSTITUTIONAL VIOLATIONS OF SEVERE MAGNITUDE. PLAINTIFF ASKS THE PRESIDING FEDERAL AUTHORITY HOLD ALL RESPONSIBLE PARTIES ACCOUNTABLE FOR THE GROSSLY UNCONSTITUTIONAL TRANSGRESSIONS, WHICH VIDEO RECORDINGS WILL INFECT VERIFY.

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B.I. MEDICAL DELIBERATE INDIFFERENCE

I. THIS SECTION OF THE COMPLAINT'S INSCRIPTIONS INVOLVE VINDICTIVELY INTENTIONAL VIOLATIONS AND DEPRIVATIONS OF PLAINTIFF'S EIGHTH AND FIRST AMENDMENT RIGHTS. THE ACTIONS INSCRIBED WERE INFLECTED UPON PLAINTIFF IN A RETALIATORY FASHION, AND CONSIST OF INTENTIONAL INFLICTIONS OF UNBEPHABLE PAINS, INHUMAN CONDITIONS, TORTUROUS SUFFERINGS AND BRUTAL REPRISALS WITH RETALIATIONS AND DELIBERATE INDIFFERENCE TO SERIOUS PHYSICAL INJURIES, AS WELL AS MEDICAL CONDITIONS. PLAINTIFF IS UNAWARE AS TO THE EXTENT TO WHICH THESE UNCONSTITUTIONAL INFLICTIONS EXTEND WITH REGARDS TO VIOLATIONS OF THE CONSTITUTION, AND THEREFORE IMPLORE UPON THE JUDICIAL CHAMBERS TO INTERPRET SUCH ACCORDINGLY.

II. THE INVOLVED CULPRITS ABLE TO BE IDENTIFIED AND INTENDED TO BE LISTED AS DEFENDANTS IN CASE, INCLUDE, BUT ARE NOT LIMITED TO THE FOLLOWING PARTIES: DEPUTY WARDEN OF SPECIAL SERVICES MR. ANTHONY CADOGAN, WITH WHOM IS CHARGED WITH THE TASK OF ENSURING THE DELIVERY OF MEDICAL CARE (AMONG OTHERS) - HEALTH CARE ADMINISTRATOR, MRS. CLAPP, WITH WHOM IS CHARGED WITH THE TASK OF ENSURING MEDICAL SERVICES AND DAILY OPERATIONS REMAIN IN COMPLIANCE WITH STATE POLICY - CHIEF MEDICAL OFFICER, FISCAL EMPLOYED WITH WHOM'S OBLIGATION (AT TIME OF OFFENSE) IT WAS TO PROVIDE PLAINTIFF WITH ADEQUATE MEDICAL CARE. THESE DEFENDANTS FAILED, INTENTIONALLY, TO ADHERE TO THEIR STATE OBLIGATIONS BY THE VIOLATIONS AND BLATANT DISREGARDS. PLAINTIFF ASK THE COURTS TO HOLD THE PARTIES LISTED ACCOUNTABLE FOR THEIR TRANSGRESSIONS, AS SET FORTH IN THE FOLLOWING ASSERTIONS. ALL MATTERS SET FORTH IN ASSERTIONS ARE TRANSCRIBED AS ENCOUNTERED.

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III. ON MARCH 3rd, 2015, AT SOUTHERN OHIO CORRECTIONAL FACILITY (S.O.C.F.), PLAINTIFF JEREMY P. GALLANT, SUSTAINED A SEVERE INJURY TO RIGHT HAND - *BROKEN FRACTURE METACARPAL BONE ALONG THUMB - WRIST AREA.*

IV. THIS INJURY, AND THE EXTENT OF AGONIZINGLY PAINFUL SYNDROMES WAS ANNOUNCED, BY PLAINTIFF, TO NUMEROUS STATE OFFICIALS AND MEDICAL STAFF, ALL IN WHICH COMPLETELY DISREGARDED PLAINTIFF'S DESPERATE PLEAS FOR MEDICAL.

V. DUE TO THE SURROUNDING CIRCUMSTANCES INVOLVED, PLAINTIFF REMAINED PATIENT, COMPLAINT, AND PERSISTENT IN OBTAINING MEDICAL TREATMENT.

VI. ON MARCH 6th, 2015, PLAINTIFF INITIATED A HUNGER STRIKE IN A FRANTIC AND MOST DESPERATE ATTEMPT TO RECEIVE MEDICAL, AS THE UNTREATED INJURIES WERE PAINFULLY UNBEARABLE TO REMENT.

VII. AT SOME POINT IN TIME, AFTER PLAINTIFF INITIATED HUNGER STRIKE, PLAINTIFF HAD AN X-RAY DONE OF RIGHT HAND, WHICH CONFIRMED A BROKEN METACARPAL BONE.

VIII. PURSUANT TO D.C. POLICY 68-MED-17 "HUNGER STRIKE" THE PLAINTIFF WAS CLASSIFIED AS HUNGER STRIKE ON MARCH 9th, 2015, AFTER REFUSING THE 9th CONSECUTIVE MEAL.

IX. ON THIS VERY DAY, MARCH 9th, 2015, PLAINTIFF WAS NOTIFIED BY STATE OFFICIALS, THAT PLAINTIFF WOULD BE SEEN BY DEFENDANT FRISAL WHOED, THE CHIEF MEDICAL OFFICER.

X. PLAINTIFF HESITATED AT THE NOTION OF ONCE AGAIN SUBJECTING HIS SELF TO THE CRUEL HANDS OF DEFENDANT FRISAL WHOED, AS PREVIOUS ENCOUNTERS BETWEEN PLAINTIFF AND DEFENDANT (MAY, 19th - 2014) RESULTED IN FRISAL WHOED'S DELICIOUS AGGRADATIONS OF PLAINTIFF'S INJURIES.

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XI PLAINTIFFS PERSONAL RECOLLECTIONS FROM MARCH 9TH, 2015, PROCEEDS AS FOLLOWS: I Tremble AT THE THOUGHT OF THIS DISGUSTING CRETIN OF A DOCTOR, AS I IMMEDIATELY FLASH BACK TO A PREVIOUS ENCOUNTER INVOLVING WHAT CAN ONLY BE CLASSIFIED AS A TORTURE SESSION, WHERE THE DEFENDANT, FAISAL AHMED, ALLOWED HIS PERSONAL CONTENTIONS AND UNWILLED RESENTMENTS ACCUMULATED DUE TO MY PREVIOUS CIVIL LITIGATIONS DIRECTED AT HIM, TO INTERRUPT THE PROFESSIONAL OBLIGATIONS, ETHICAL COMMITMENT, AND MORAL OPTITUDE, CAUSING FAISAL AHMED TO LAST OUT IN A RETALIATORY REPRISAL. ON MAY 19TH, 2014, IN S.O.C.F. I MADE ATTENDANCE TO A MEDICAL EXAMINATION FOR AN INJURY I SUSTAINED TO MY RIGHT KNEE. THIS APPOINTMENT OCCURRED SHORTLY AFTER FAISAL AHMED WAS SERVED WITH THE CIVIL CASE 1:14-CV-199. IT WAS DURING THIS EXAMINATION THAT PLAINTIFF (I) SUFFERED THE WEIGHT OF FAISAL AHMED'S RETALIATIONS. DURING THE APPOINTMENT, AS I LAY UPON THE EXAMINERS TABLE, FAISAL AHMED FORCEFULLY GRABS HOLD OF MY INJURED RIGHT LEG AND BEGAN TO AGITATE THE INJURY TO INTENTIONALLY INFLICT AGONIZING PAINS. NOT ONLY WAS THIS TERRORISTIC ENCOUNTER STAINED UPON MY CONSCIOUS, I WAS ALSO WEARY OF DEFENDANT FAISAL AHMED'S FALSIFIED FABRICATIONS AND FRAUDULENT COMPOSITIONS INSERTED INTO MY MEDICAL RECORDS RELAYING THAT I AM DRUG SEEKING, Malingering, and demanding narcotics. THESE UNETHICAL ACTS ARE PUT FORTH TO SLANDER, TARNISH AND DEFAME MY NAME, WITH CHARACTER ASSASSINATIONS. IF ONLY I WOULD OF LISTEN TO MY FIRST INTUITION AND TOOK HEED TO MY PREVIOUS ENCOUNTERS WITH THE MERCILESS FAISAL AHMED. UNFORTUNATELY I DID NOT, AS I WAS FORCED TO EITHER ATTEND THE SESSION WITH FAISAL AHMED OR GO WITHOUT MEDICAL. ON MARCH 9TH, 2015, I ATTENDED THE APPOINTMENT WITH DEFENDANT AHMED AND I WILL FOREVER REGRET IT + END OF RECOLLECTION *

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XII. On March 9th, 2015, at or around 9:30 a.m. Plaintiff, while handcuffed behind the back legs tightly strangled and with a very painful broken right hand, made attendance at the physical examination with Defendant named.

XIII. During the March 9th, 2015, physical examination, a contentious confrontation arose, between the Plaintiff and Defendant named, resulting in Plaintiff being openly assaulted by both Defendant named and unidentified state officials.

XIV. The entire incident on March 9th, 2015, was deceitfully revised by state officials conspired fabrications, in order to make it appear as if Plaintiff assaulted Defendant named during the physical altercation, which is untrue and incorrect.

XV. Defendants, Mr. Cadogan, Mrs. Clegg and Fiscal named both before and after the March 9th, 2015 incident were deliberately indifferent to Plaintiff's serious injuries, pains, and sufferings by the very vindictively intentional refusals to provide any medical treatments, thus inflicting cruel and inhuman conditions conceived in a retaliatory fashion, in direct violation of Plaintiff's constitutional rights.

XVI. Due to Defendants deliberate indifference, Plaintiff was forced to reside from March 3rd to the 17th, 2015, with absolutely no medical treatment for the serious physical injuries and symptoms.

XVII. On March 17, 2015, Plaintiff was finally medically transferred and emergency admitted to Franklin Medical Center. Such emergency transportation was not initiated by any of the Defendants, but rather was made by outside interventions. For was it not for outside intervention, Plaintiff would have remained with untreated injuries.

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XVIII. On March, 18th 2015, at OHIO STATE MEDICAL CENTER, PLAINTIFF UNDERWENT SURGERY TO RECEIVE 3 METAL PINS, BEING INSERTED INTO THE BROKEN RIGHT HAND.

XIX. UPON PLAINTIFF'S RETURN TO S.O.C.F., LISTED DEFENDANTS ONCE AGAIN SHOW DELIBERATE INDIFFERENCE TO PLAINTIFF'S INJURY AND MEDICAL CONDITIONS, FORCING PLAINTIFF TO ENDURE SUCH INHUMAN SUFFERINGS WHILE RESIDING IN A MENTAL HEALTH SUICIDE CELL (HOUSING UNIT J-1 CELL 2).

XX. DUE TO DEFENDANTS AND STATE OFFICIALS DELIBERATE INDIFFERENCE AND COMPLETE DISREGARD FOR PLAINTIFF'S MEDICAL CONDITIONS, PLAINTIFF'S RIGHT HAND BECAME INFECTED, GROSSLY INFLAMED, AND PAINFULLY SWOLLEN PRODUCING FOUL SMELLING DISCHARGE.

XXI. On May, 18th 2015, THE PLAINTIFF, DUE TO SERIOUS INFECTION, HAD TO BE EMERGENCY TRANSFERRED TO OHIO STATE MEDICAL CENTER, WHERE THE ATTENDING PHYSICIAN MADE WRITTEN ORDERS FOR TREATMENT.

XXII. UPON PLAINTIFF RETURNING TO S.O.C.F. THE LISTED DEFENDANTS AND STATE OFFICIALS ONCE AGAIN DELIBERATELY INDIFFERENT TO PLAINTIFF'S INJURIES AND CONDITIONS, BY REFUSING ALL OF THE ORDERS FOR TREATMENT.

XXIII. IN CONCLUSION TO THIS SECTION OF THE COMPLAINT, THE PLAINTIFF, DUE TO THE LISTED DEFENDANTS AND UNIDENTIFIED STATE OFFICIALS DELIBERATE INDIFFERENCE TO, DERELICTIONS OF DUTY FOR, AND COMPLETE DISREGARD WITH THE INJURIES AND MEDICAL CONDITIONS, WAS SAVAGELY SUBJECTED TO CRUEL AND INHUMAN INFLICTIONS WITH THE DEPRIVATIONS OF BASIC CONSTITUTIONAL RIGHTS. THE INTOLERABLE AND HORRENDOUS INFLICTIONS SET JUSTIFICATION FOR ENTITLED RELIEF AND LEGAL REDRESS BEING ISSUED BY THIS VENUE OF JUDICIAL LAW.

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XXIV. PLAINTIFF NOW SUFFERS PERMANENT DISFIGUREMENT DUE TO DEFENDANTS DEPRIVATIONS OF RIGHTS AND ASK THE COURTS TO HOLD ALL LISTED DEFENDANTS ACCOUNTABLE.

~ ACTS OF RETALIATION ~

~ Campaign of Harassment ~

I. ALL INSCRIPTIONS WRITTEN WITHIN THIS SECTION OF THE COMPLAINT ARE PLAINTIFF RECOLLECTIONS RECITINGS IN RETALIATIONS ENCOUNTERED IN A Campaign of Harassing reprisal. EACH AND EVERY INSERT TRANSCRIBED, HAS IN FACT BEEN PERPETRATED UPON THE PLAINTIFFS PERSONS IN A VINDICTIVELY RETALIATORY MANNER, FOR THE PLAINTIFFS PURSUITS IN THE UNDERLYING CONSTITUTIONAL VIOLATIONS AND DEPRIVATIONS.

II. THIS SECTION OF THE COMPLAINT INCLUDES BUT IS NOT LIMITED TO FIRST AND EIGHTH AMENDMENT VIOLATIONS COMMITTED BY LISTED DEFENDANTS AND UNIDENTIFIED STATE OFFICIALS. DESCRIPTIONS BEGIN WITH THE MOST SEVERE ACTS OF REPRISAL.

ACT 1: ON JULY 2, 2015, WITHIN S.O.C.F. HOUSING UNIT J-1 CELL 5, AT OR AROUND 2:30 A.M. - 3:30 A.M. IN THE EARLY MORNING HOURS PLAINTIFF WAS SLEEPING.

ACT 2 AT OR AROUND THIS TIME, PLAINTIFF WAS JARRED AWAKE BY A LOUD COMOTION AND AN UNKNOWN NOISE, FOLLOWED BY A VERY STRONG AND POTENT CHEMICAL SMELL. AN UNIDENTIFIED STATE EMPLOYEE MADE A COMMENT AT THIS TIME, REGARDING PLAINTIFF'S CIVIL LITIGATIONS.

ACT 3. THE COMMENT WAS MADE FROM A DISTANCE, AND PERTAINED TO A PARTICULAR DEFENDANT, MRS. CLAGG ~ ALONG THE LINES OF: ~ "THAT WILL TEACH YOU TO SUE MRS. CLAGG."

ACT 4. FOR THE RECORD, MRS. CLAGG IS A LISTED DEFENDANT IN CIVIL ACTION, CASE NO. 1:14-CV-199 COLLANTY V. JAMES ~

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~ 7.4 ~ INITIATED IN THIS VENUE OF JUDICIAL LAW,
AND IS THE SPOUSE OF S.O.C.F.'s CPT CL999...

7.5. AT THIS TIME ON JULY 2, 2015, PLAINTIFF WAS OVERWHELMED BY A VERY POTENT CHEMICAL SUBSTANCE THAT SEEM TO PENETRATE AND STAIN PLAINTIFF'S SENSES... THIS LETHAL SUBSTANCE REMAINED STAINED UPON PLAINTIFF'S SENSE OF SMELL FOR OVER 48 HOURS.

7.6. PLAINTIFF WAS ALSO OVERWHELMED WITH AN INTENSE BOUT OF COUGHING, AS THE BODY'S INTERNAL ORGANS IMMEDIATELY BEGAN TO REJECT WHATEVER LETHAL SUBSTANCE THAT WAS INHALED...

7.7 DUE TO THIS SEVERE FIT OF COUGHING AND THE POTENT CHEMICAL ODOR THAT REMAINS, PLAINTIFF COULD NOT RETURN TO SLEEP. THE BOUTS OF COUGHING INCREASED, AND THE VERY TOXIC AND PUNGENT CHEMICAL ODOR WAS ALL PLAINTIFF COULD SMELL AS BREATHING COMPLICATIONS CONTINUE...

7.8. PLAINTIFF'S PERSONAL RECOLLECTIONS FROM JULY 2, 2015 PROCEED AS FOLLOWS: I IMMEDIATELY SUSPECT FOUL PLAY, AS ANYONE WOULD, AS IT WAS QUITE APPARENT THAT SOME SORT OF LETHAL SUBSTANCE HAD JUST BEEN COVERTLY ADMINISTERED. HOWEVER, OUT OF STICK AND FEARFUL PANIC, I ATTEMPT TO FIND SOME SORT OF EXPLANATION TO WHAT JUST OCCURRED. WITH TIME CONTINUING AND THE CHEMICAL ODOR STAINING MY ENTIRE SENSE OF SMELL, AND WITH THE COUGHING ENHANCING, I KNEW WHAT JUST HAPPENED, I WAS TARGETED DUE TO MY CIVIL PURSUITS, WITH SOME SORT OF LETHAL CHEMICAL AGENT BEING ADMINISTERED IN RETALIATION. STILL TO THIS VERY DAY I SUFFER BREATHING COMPLICATIONS FROM THIS INCIDENT AND IT IS ONLY A MATTER OF TIME UNTILL WHATEVER CHEMICAL SUBSTANCE WAS USED TAKES FULL EFFECT. I KNOW MY OWN BODY, AND IT HAS BEEN EXPOSED TO A LETHAL CHEMICAL.

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7.9. PLAINTIFF, immediately after the July 2, 2015 incident, made desperate pleas of obtaining emergency medical treatment by submitting health service request, institutional correspondence and utilizing available state remedies with efficacies.

7.10. Listed Defendants and responsible state officials, were in fact notified of this incident, and completely ignored such entirely, refusing to act accordingly denying Plaintiff any actions, medical, nor investigations.

7.11. Plaintiff, on August 2, 2015, due to the suffocating effects and symptoms, with the breathing complications persistently worsening, had to be emergency transferred to S.O.C.F. medical infirmary.

7.12. On this day, August 2, 2015, Plaintiff did in fact relay the July 2, 2015 chemical exposure to the attending medical staff, who completely disregarded such.

7.13. On this day, August 2, 2015, an unidentified medical official fraudulently reported that Plaintiff refused medical treatment during expiration. ~ False ~

7.14. Plaintiff, to this very day, still suffers breathing complications and deterioration of health, as a result of the July 2, 2015 chemical exposure, all while state officials and listed Defendants continue to be deliberately indifferent to the incident, refusing Plaintiff all forms of medical treatment and testing.

7.15. Plaintiff's personal Declaration: In conclusion to this section of the Complaint and for official record, should any certain illness, injury or inexplicable fatality befall upon I, Jeremy P. Gallant despite what any report may relay as -

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7.15 - Cause, THE COURTS MUST KNOW THAT SUCH WAS NOT THE RESULT OF NATURAL ORIGIN AND WAS BROUGHT ABOUT DUE TO THE EVENTS TRANSCRIBED. IT IS SHOCKING AS TO HOW THESE STATE OFFICIALS ARE ABLE TO FREELY EXCHANGE SUCH RUTHLESS REPRISAL... WHAT IS EVEN MORE DISTURBING AND A SHOCKING TRUTH TO THIS LUCASVILLE REGIME'S UNLAWFUL ETHICS AND DISGUSTING OPERATIONS, IS AFTER SUPERVISING OFFICIALS WERE MADE AWARE OF THE EVENTS THAT TRANSPICED, THEY ALL COMPLETELY DISREGARDED THE JULY 2, 2015 TRANSGRESSIONS... IT IS QUITE ALARMING AS TO HOW THE LISTED DEFENDANTS, STATE OFFICIALS, AND OUTSIDE STATE AGENCIES, AFTER BEING ADVISED OF THE JULY 2, 2015, INCIDENT, TURN A BLIND EYE, DEAF EAR, COMPLETELY IGNORING MY PLEAS FOR ASSISTANCE AND AIDE. I REMAIN IN A HEAVY STATE OF DISCOMFORT, AS WHATEVER LETHAL CHEMICAL SUBSTANCE I WAS MALICIOUSLY EXPOSED TO, CONTINUES TO INTERFERE UPON MY HEALTH. THINGS HAVE SPIRALLED COMPLETELY OUT OF CONTROL ALL BECAUSE I CHOOSE TO STAND UP FOR MY RIGHTS WHILE ENGAGED... I BOLDLY STAND UP, IN THE FACE OF SUCH ADVERSITY, OPPOSING THIS DISGUSTING AND DEMENTED INJUSTICE... DO KNOW, THAT WHEN MY ULTIMATE DEPOSE DOES OCCUR THE INVESTIGATING PARTIES, WILL ONLY HAVE TO MAKE REFERENCE TO THIS PARTICULAR ASSERTION TO DISCOVER THE TRUTH AND CAUSE... I HAVE COME TO TERMS WITH SUCH A UGLY SHADES OF REALITY, AND I WELCOME MY FATE. I CONTINUE TO SUFFER HEALTH COMPLICATIONS, DUE TO THE MALICIOUSLY HEINOUS TRANSGRESSIONS WITH CHEST AND ABDOMEN PAINS, BREATHING TROUBLES, AND OTHER TROUBLES I HAVE NEVER BEFORE ENCOUNTERED... DO KNOW, THAT WHENEVER MY END SHOULD ARRIVE, IT'S PREMATURE APPEARANCE WAS BROUGHT BY THIS INCIDENT... I ASK THE COURTS TO REMEMBER THIS ASSERTION UPON MY FATALITY.

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D. ACTS OF RETALIATION

Campaign of Harassment

- STATE REMEDY EXHAUSTION PREVENTION -

I. THIS SECTION OF THE COMPLAINT'S ALLEGATIONS CONTAINS FURTHER ACTS OF RETALIATIONS COMMITTED IN SUCH A CAMPAIGN BY LISTED DEFENDANTS INSPECTOR MATTHEW CHIEF INSPECTOR ROGER WILSON, ASSISTANT CHIEF INSPECTOR EUGENE HUNYADI AND UNIDENTIFIABLE STATE OFFICIALS. THE ACTS TRANSCRIBED PERTAIN TO UNCONSTITUTIONAL DEPRIVATIONS OF 14TH AMENDMENT RIGHTS OF DUE PROCESS WITH A UNLAWFUL IMPLEMENTATION OF STATE REMEDY RESTRICTION IN PLAINTIFF'S ABILITY FOR UTILIZATIONS OF THE 5120-9-31 GRIEVANCE PROCEDURES, WHICH IN TURN, IMPEDES UPON ACCESS TO COURT. THIS UNCONSTITUTIONAL DEPRIVATION IS CONCEIVED IN A RETALIATORY OFFENSE AS DEFENDANTS STRATEGICALLY SET-IN-PLACE A GRIEVANCE RESTRICTION, THEREFORE RENDERING SUCH EXHAUSTION IN COMPLIANCE, FUNDAMENTALLY UNAVAILABLE. THIS UNLAWFUL RESTRICTION AND UNCONSTITUTIONAL PREVENTION INFLECT WAS IMPOSED FOR A FRAUDULENT REASONING AS ALLEGATIONS GO TO STATE. SUCH INFLECTIONS AND UNCONSTITUTIONAL DEPRIVATIONS DID INFLECT CONSTRUCT HINDERING EFFECTS, OBSTRUCTING OBSTACLES, AND PREVENTIVE BARRIERS, IN PLAINTIFF'S ABILITIES IN COMPLYING WITH FEDERAL REQUIREMENTS IN STATE REMEDY EXHAUSTIONS WITH SOME COMPONENTS IN THE CIVIL ALLEGATIONS.

II. PLAINTIFF, ALONG WITH FELLOW S.O.C.F. STATE PRISONERS, DURING THE MONTH OF JUNE & JULY, 2015, IN HOUSING UNIT J-1, CONTINUED TO ENCOUNTER U.S. MAIL OBSTRUCTIONS, TAMPERINGS AND UNLAWFUL WITH-HOLDINGS, WITH REGARDS TO PERSONAL OUTSIDE CORRESPONDENCE...

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III. PLAINTIFF, AND THE INFLECTED PRISONERS AFTER ENCOUNTERING REPETITIVE ACTS OF U.S. MAIL OBSTRUCTIONS, SOUGHT TO PURSUE SUCH UNLAWFUL TRANSGRESSIONS BY UTILIZING THE O.D.P.C. INTERNAL REMEDY 5120-9-31, PRISONER GRIEVANCE PROCEDURE.

IV. PLAINTIFF, IN THE PROCESS OF UTILIZING STATE REMEDIES IN THE ONGOING U.S. MAIL OBSTRUCTIONS, DID IN FACT ASSIST FELLOW PRISONERS IN PURSUITS WITH INTERNAL REMEDY AND GRIEVANCE.

V. ON JULY 14TH 2015, WITHIN S.O.C.F.'S HOUSING UNIT J-1, PLAINTIFF WAS IN FACT SERVED WITH A D.P.C. INFORMAL COMPLAINT RESOLUTION RESTRICTION, DATED JULY 7TH 2015, WHICH WAS AUTHORIZED AND ENDORSED BY BOTH DEFENDANTS ORHLERMAN AND HUNYARDI...

VI. THIS UNLAWFUL RESTRICTION AND UNCONSTITUTIONAL DEPRIVATION WAS IMPOSED FOR A FRAUDULENT REASON, RELAYING "ABUSE" "MISUSE" AND "REPETITIVE FILING"

VII. PLAINTIFF, UPON BEING UNJUSTLY SERVED AND UNLAWFULLY SANCTIONED WITH SUCH RESTRICTION, WAS DENIED ALL FORMS OF APPEAL AND ANY OPPORTUNITIES TO HAVE SUCH RESTRICTION HEARD FURTHER ON BEFORE A REVIEW BOARD FOR PROPER EXAMINATION AS A MATTER OF DUE PROCESS, IN DIRECT VIOLATION OF PLAINTIFF'S RIGHTS.

VIII. PLAINTIFF, FOR OFFICIAL RECORD AND AS A MATTER OF CONSTITUTIONAL ASSERTION MUST STATE THAT SUCH A RESTRICTION DIRECTLY AFFECTS AND IMPEDES UPON A PRISONER'S ABILITY IN ACCESSING COURTS BY INTER-FERING IN THE EXHAUSTION DECREE OF P.L.M. AND SHOULD THEREFORE ENTAIL ITS VERY OWN DUE PROCESS PROCEDURE INTERNALLY... IT DOES NOT, WHICH IS A DEPRIVATION OF CONSTITUTIONAL RIGHTS.

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IX. ON July 15th 2015, in S.O.C.F. Housing Unit J-1 Cell 5, Plaintiff received a D.M.C. 4018 Form "Conduct Report - Composed by Defendant of defendant, alleging violations of Rule 61: - "any violation of published institutional rules, regulations, or procedure."

X. Defendant of defendant, within this falsely constructed Conduct Report, goes to fabricate allegations stating: "inmate Gallant conspired with other inmates to file grievances on the April 1900" - which is incorrect, but set in place to justify the unlawfully imposed grievance restriction. No other Conduct Reports were issued.

XI. Plaintiff, was unjustly inflicted by this unlawful state remedy restriction and has in fact secured the necessary documentation and declarations by alleged co-conspirators to disprove defendant's fraudulent fabrications and falsely conceived allegations derived to impose the obstructing grievance restriction.

XII. Plaintiff, after being served with the unlawfully imposed grievance restriction immediately notified Defendant Roger Wilson, the Chief Inspector, of these grossly unconstitutional deprivations which Mr. Wilson completely disregarded, refusing to necessary actions to end such transgressions, keeping the Defendant responsible accessory as a condoning culprit.

XIII. Due to listed defendants and state officials infringements upon Plaintiff's rights, with the deprivation of state remedy, Plaintiff was unable to comply with exhaustion requirement in certain aspects of case.

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E. ACTS OF RETALIATION

Campaign of Harassment

U.S. Mail Obstructions - Tampering UNLAWFUL INVASIONS & OPERATIONS

I. THIS SECTION OF THE COMPLAINT'S ALLEGATIONS INVOLVE AFFIRMATIONS CONTAINING VIOLATIONS OF FIRST AMENDMENT RIGHTS WITH U.S. MAIL OBSTRUCTIONS, TAMPERINGS, INTRUSIONS, AND UNLAWFUL OPERATIONS COMMITTED IN A RETALIATORY FASHION AND STRATEGIC MANNER. THE RESPONSIBLE STATE OFFICIALS ABLE TO BE IDENTIFIED INCLUDE BUT IS NOT LIMITED TO THE FOLLOWING PARTIES: DEPUTY WARDEN COOL, MAIL ROOM SUPERVISORS MR. FRAZIE & MR. WHITMAN, MAIL ATTENDANTS MR. GREGG & MR. SATTERSFIELD AND UNIDENTIFIED CULPRITS. PLAINTIFF SOUGHT TO UTILIZE AND EXHAUST ALL AVAILABLE STATE REMEDY FOR EACH INDEPENDANT ACT OF U.S. MAIL OBSTRUCTION WHEN DECEITTED BY STATE.

II. PLAINTIFF, WITHIN THIS SECTION OF THE COMPLAINT'S DESCRIPTION LIST EACH ACT OF INDEPENDANT OBSTRUCTION AS ENCOUNTERED AND CONFIRMED.

ACT 1: ON JUNE 12TH 2014 THE PLAINTIFF WAS TRANSFERRED FROM S.O.C.F. TO FRANKLIN MEDICAL CENTER (F.M.C.) FOR A HUNGER STRIKE, AND WAS ADMITTED FROM JUNE 12TH TO AUG. 12TH 2014. DURING THIS TIME LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS REFUSED TO FORWARD ALL OF PLAINTIFF'S RECEIVED MAIL DURING ABSENCE, IN DIRECT VIOLATION OF POLICY PROCEDURES, AND PLAINTIFF'S CONSTITUTIONAL RIGHTS. PLAINTIFF, UPON EXHAUSTING STATE REMEDIES IN THIS AFFAIR, DID INFACT OBTAIN A DECISION VERIFYING AND CONFIRMING THE UNCONSTITUTIONAL TRANSGRESSIONS.

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ACT 2: On February, 18th, 2015, in S.O.C.F.'s Housing Unit L-7, Plaintiff received legal mail from this Court. This particular parcel of legal mail was post dated February, 5th, 2015, and was intentionally with-held by listed Defendants and responsible State officials, in direct violation of policy, procedures, and Constitutional rights. This form of U.S. mail tampering only continue to occur to this very day. Plaintiff did in fact exhaust the state remedy and does possess documentation to show this act of U.S. mail obstruction.

ACT 3: Plaintiff, for the month of February, 2015, received absolutely none of the magazine subscriptions subscribed to. This failure to service occurs with vindictive intent only after Plaintiff receives a decision by O.D.P.C.'s Chief Inspector (conform ACT 1's assertion) reversing the denial of grievance and finding favor in Plaintiff's appeal by offsetting the act of U.S. mail obstruction. After Plaintiff received a decision by Chief Inspector, Plaintiff encounters a barrage of U.S. mail obstructions.

ACT 4: Plaintiff, for the month of March, 2015, received absolutely none of the magazine subscriptions subscribed to. Plaintiff also continues to encounter U.S. mail obstructions in personal communications.

ACT 5: This particular act of U.S. mail obstruction pertains to listed Defendants and S.O.C.F. State officials intrusions of confidential legal affairs. Plaintiff, on June, 19, 2015, in S.O.C.F.'s Housing Unit J-1, received legal mail from a pro. organized with ~

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- ACT 5 - THE OHIO ATTORNEY GENERAL, regarding matters in Civil Litigations. Instead of this private and confidential parcel of legal mail being properly serviced, as required, delivery was made via regular mail. Listed Defendants and responsible State Officials violated Plaintiff's Constitutional Rights by unlawfully processing confidential legal mail. Listed Defendants and State Officials intruded upon the privacy of the confidential legal mail by opening the parcel outside Plaintiff's presence.

ACT 6: ON JUNE 19TH, 2015 WITHIN S.O.C.F. HOUSING UNIT J-1, PLAINTIFF RECEIVED YET ANOTHER LEGAL PARCEL IMPROPERLY SERVICED FROM GEORGETOWN LA W. THIS PARTICULAR PARCEL OF LEGAL MAIL WAS ONCE AGAIN OPEN OUTSIDE THE PRESENCE OF THE PLAINTIFF, IN DIRECT VIOLATION OF POLICY PROCEDURE, AND CONSTITUTIONAL RIGHTS.

ACT 7: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION INVOLVES LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS STRATEGIC MANIPULATIONS WITH MAIL TAMPERING AND FIDELITY WITH-HOLDINGS. AS PLAINTIFF CONTINUES TO ENCOUNTER THESE ACTS OF U.S. MAIL OBSTRUCTIONS THE MORE INTUITIVE AND ATTENTIVE PLAINTIFF BECOMES, BEING COMPLETELY OBSERVANT TO ALL MAIL. PLAINTIFF ON JUNE 22, 2015, WITHIN S.O.C.F.'s HOUSING UNIT J-1, RECEIVED LEGAL CORRESPONDENCE FROM THIS COURT (CINCINNATI, OH). THE LEGAL PARCELS (X-2) RECEIVED WERE POST DATED JUNE 18, 2015. ON JUNE 23RD, 2015, PLAINTIFF RECEIVED YET ANOTHER LEGAL PARCEL, AGAIN, FROM CINCINNATI. THE POST DATE ON THIS PARCEL OF LEGAL MAIL WAS JUNE 17, 2015, WHICH ONLY GOES TO SHOW AND REVEAL THE INTENTIONAL MANIPULATIONS WITH SELECTIVE SERVICE AND FIDELITY WITH-HOLDINGS.

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ACT 7 - PLAINTIFF, upon making discovery of such strategically crafted tactic with the selective service and timely with-holdings put forth intensive examinations in all mail received... It was then after, plaintiff makes discovery of a flurry of mail obstructions...

ACT 8: This act of U.S. mail obstruction involves a incident affecting a group of prisoners within housing unit J-1 of S.O.C.F. Plaintiff along with other parties, upon confirming these acts of U.S. mail obstructions, utilized the available state remedies, in a group effort to obtain solution and end such unlawful actions. Upon utilization there-of, not only does plaintiff encounter further mail obstructions in retaliation by listed defendants, but also plaintiff is unjustly inflicted with a vindictively conceived state remedy grievance restriction, as is asserted in section D of this complaint (please refer pg. 18 para 1-xiii). This entire incident occurs in June-July 2015, and plaintiff has obtained declarations to support.

ACT 9: This particular act of U.S. mail obstructions pertains to the listed defendants and responsible state officials further strategic methods of such grossly unconstitutional mail services. This incident as encountered, only goes to confirm such blatantly intentional acts of unlawful U.S. mail obstructions, with timely intrusions, with-holdings, and selective servicing, all committed in a deviously deceitful fashion. In the month of May, 2015, plaintiff's family member made purchase of legal books from prison legal news (Teaching no. 94490118995623-45854057). These books were to assist plaintiff in pro-se litigations. These legal books arrived at this facility on May, 21, 2015 as indicated -

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- ACT 9: - by Trenching. LISTED DEFENDANTS and UNIDENTIFIED STATE OFFICIALS INTENTIONALLY WITHHELD THESE LEGAL BOOKS UNTILL JULY 2015. IT WAS NOT UNTILL I WAS ADVISED BY FAMILY THAT THE BOOKS HAD LONG AGO ARRIVED THAT I BEGAN TO INQUIRE INTO THE LEGAL BOOKS WHEREABOUTS, THAT LISTED DEFENDANTS ACKNOWLEDGED POSSESSION, AFTER WITH-HOLDING THEM FOR SUCH A TIME - LISTED DEFENDANTS MADE FEEBLE ATTEMPTS IN FABRICATING JUSTIFICATION IN THE UNLAWFUL WITH-HOLDING BY FALSELY RELAYING A FRAUDULENT DATE OF RECEIPT, WITH THESE LEGAL BOOKS... PLAINTIFF DID UTILIZE THE STATE REMEDY, and INFECT OBTAINED FAVOR BY THE DEPARTMENTS INSPECTOR CONFIRMING BOTH THE GRIEVANCE ASSERTION AND THE UNLAWFUL ACT OF U.S. MAIL OBSTRUCTION.

ACT 10: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION PERTAINS TO LEGAL CORRESPONDENCE FROM THIS VERY COURT. THE CONFIDENTIAL PARCEL OF LEGAL MAIL WAS INFECT CLEVERLY WITHHELD BY LISTED DEFENDANTS AND STATE OFFICIALS IN A TIMELY FASHION WITH UNDERLYING INTENTIONS OF HINDERING AND DISRUPTING PLAINTIFF'S ABILITY IN CIVIL LITIGATIONS. ON MONDAY, JULY 6th, 2015, PLAINTIFF RECEIVED A COURT ORDER - CIVIL CASE 1:14-CV-199 DOC 115 - THE POST DATE ON THE LEGAL PARCELS CARRIER WAS JUNE 23rd, 2015. DUE TO LISTED DEFENDANTS AND STATE OFFICIALS STRATEGICALLY INTENTIONAL WITH-HOLDINGS, SELECTIVE SERVICES AND TIMELY DELAYS, SUCH OBSTRUCTIVE TAMPERINGS INTERRUPTED PLAINTIFF'S ABILITY TO LITIGATE IN RESPONSE...

ACT 11: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTIONS PERTAINS TO LISTED DEFENDANTS AND STATE OFFICIALS DEVISIVELY IMPOSED AND DECEITFULLY CRAFTED MAIL INTERRUPTIONS, INVOLVING PLAINTIFF'S SERVICED LEGAL REQUEST, WHICH WAS MADE TO THIS -

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- ACT 11 - COURT. ON July, 12, 2015, AT S.O.C.F., IN HOUSING UNIT J-1, PLAINTIFF MADE SERVICE OF A LEGAL REQUEST INTENDED FOR THIS COURT. ADDRESS AS STATED: U.S. DISTRICT COURT, S.D.-W.O. 100 E. FIFTH ST. CINCINNATI, OH, 45202. PLAINTIFF, ON July, 22, 2015, RECEIVED THE SERVICED LEGAL REQUEST, WITH A INVALID AND FRAUDULENTLY APPLIED "NOT KNOWN (ADDRESS) UNABLE TO FORWARD". THE SERVICED LEGAL REQUEST WAS CORRECTLY ADDRESSED AND CLEARLY MARKED "LEGAL MAIL" AND "CONFIDENTIAL". THIS LEGAL REQUEST WAS RETURNED DECEPTFULLY, IN ORDER TO INTERFERE UPON PLAINTIFF'S ABILITIES IN CIVIL LITIGATIONS WITH THE INTERRUPTIONS OF LEGAL REQUEST, WITH BY THE DECEPTIVELY FORGED APPLICATION OF "UNKNOWN ADDRESS". THIS FORM OF U.S. MAIL OBSTRUCTION, OCCURS QUITE FREQUENTLY IN ALL FORMS OF PRISONER MAIL, AND IS UTILIZED TO DETOUR MAIL COMMUNICATIONS UNDER WRONGFUL ASSUMPTIONS.

ACT 12: THIS ACT OF U.S. MAIL OBSTRUCTION PERTAINS TO A INTRUSION OF PRIVACY, WITH DEFENDANTS AND STATE OFFICIALS INVASIONS IN CONFIDENTIAL LEGAL AFFAIRS. THE PARTICULAR PARCEL OF LEGAL MAIL INTRUDED UPON, ONCE AGAIN, IS FROM THIS COURT. ON Aug. 17, 2015, AT S.O.C.F. PLAINTIFF RECEIVED LEGAL COMMUNICATIONS FROM THIS COURT, POST DATED Aug. 13, 2015. THIS CONFIDENTIAL PARCEL OF LEGAL MAIL WAS IN FACT UNLAWFULLY OPEN OPEN OUTSIDE PLAINTIFF'S PERSONS, CONSTITUTING A INVASIVE INTRUSION OF PRIVACY. DEFENDANT SATERFIELD MADE SERVICE OF THIS PARCEL.

ACT 13: ONCE AGAIN, PLAINTIFF ENCOUNTERS FURTHER ACTS OF U.S. MAIL OBSTRUCTIONS AND HINDERING DISRUPTIONS WITH DEFENDANTS FRAUDULENTLY FORGED APPLICATIONS OF "INVALID/UNKNOWN ADDRESS". PLAINTIFF, ON Aug. 21st, 2015, RECEIVED A RETURNED LEGAL PARCEL. THIS PARCEL OF LEGAL MAIL WAS A REQUEST TO THE PRISONERS SELF HELP LEGAL CLINIC.

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~ ACT 13 - THIS LEGAL PARCEL WAS SERVICED ON NOV. 5TH, 2014. NEARLY A YEAR IT WAS HELD FROM PLAINTIFF, AND FINALLY RETURN.

ACT 14: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION INVOLVES LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS UNLAWFUL TAMPERINGS, WITH DEPRIVATIONS THEREOF. THIS ACT PERTAINS TO AN UNLAWFUL CONFISCATION OF A LEGAL PARCELS CARRIER, DEPRIVING THE PLAINTIFF OF THE RETURN ADDRESS FOR A RESPONSE TO BE MADE. THIS LEGAL PARCEL RELATES TO CIVIL LITIGATIONS IN CASE 1:14-CV-199 WITH A CORRESPONDENCE FROM THE OHIO ATTORNEY GENERAL (MR. MAYNARD). THIS LEGAL PARCEL WAS SERVICED VIA U.S. NEXT DAY MAIL - TRACKING NO. 12474 833 231029 8837, ON AUG. 21, 2015, AND UNLAWFULLY WITHHELD UNTIL DEFENDANTS MADE SELECTIVE SERVICE, ON AUG. 25, 2015. THIS TROPELY WITH-HOLDING WAS CONFIRMED UPON PLAINTIFF MAKING CORROBORATIONS - ON TO ANOTHER LEGAL CORRESPONDENCE. ON THIS DAY, AUG. 25TH, 2015, PLAINTIFF WAS UNLAWFULLY STRIPPED AND DEPRIVED OF THIS LEGAL PARCELS MAIL CARRIER BY DEFENDANT MR. SPEER.

ACT 15: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION PERTAINS TO LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS VINDICTIVELY CONCEIVED AND UNLAWFULLY DERIVED DENIALS IN PLAINTIFFS REQUEST FOR CERTIFIED MAIL AS METHOD OF SERVICE. PLAINTIFF, ON SEPT 4TH, 2015 MADE SERVICE OF LEGAL CORRESPONDENCE BY INTENDED CERTIFIED MAIL. PLAINTIFF WAS CHARGED \$4.43 FOR POSTAGE, AND DENIED THE SELECTED SERVICE OF CERTIFIED MAIL.

ACT 16: THIS ACT OF U.S. MAIL OBSTRUCTION INVOLVES LISTED DEFENDANTS AND STATE OFFICIALS, ONCE AGAIN, COMMITTING INTENTIONAL ACTS OF INVASIVE INTRUSIONS IN CONFIDENTIAL LEGAL MAIL, UNLAWFULLY DERIVED - - - -

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~ OCT 16 ~ ON October 13th, 2015, within S.O.C.F.'s Housing Unit #2, Cell 59, Plaintiff received legal mail from the Inter American Commission on Human Rights, involving Confidential Affairs in a Petition for Habeas Corpus. This Confidential Parcel of legal mail was unlawfully serviced via regular mail, and open outside the Plaintiff's presence constituting invasions of privacy. This act of unlawful service was committed by listed Defendants and State Officials within the mail room.

OCT 17: This particular act of U.S. mail obstruction pertains to listed Defendants and responsible State Officials unlawfully construed restrictions regarding approved literature. On Oct 28th, 2015, within S.O.C.F.'s Housing Unit #2, Plaintiff was served with a notice of confiscation regarding a received book. The confiscation of this book is empty and without merit. Listed Defendants and State Officials have in fact unlawfully implemented this book confiscation, and unjustly deprive the Plaintiff of any funds nor opportunities to appeal such confiscation in direct violation of Plaintiff's rights.

OCT 18: This act of mail obstruction pertains to yet another incident of listed Defendants and State Officials invasive intrusions into Plaintiff's Confidential legal mail. On Nov 9th, 2015, within S.O.C.F.'s Housing Unit #2, Plaintiff received Confidential legal mail from an attorney of law in relation to criminal prosecution in Scioto County, Ohio. Once again, a Confidential legal correspondence was serviced via regular mail, being open up outside the presence of the Plaintiff constituting an unlawful act of invasion of privacy, in direct violation of Plaintiff's rights.

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ACT 19: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTIONS INVOLVES YET ANOTHER UNLAWFUL CONFISCATION, COMMITTED BY LISTED DEFENDANTS AND STATE OFFICIALS. ON DECEMBER 1ST, 2015 WITHIN S.O.C.F. HOUSING UNIT K1, CELL 2, AT OR AROUND 3:15 P.M. PLAINTIFF RECEIVED COMMUNICATIONS FROM CENTRAL TEXAS F.B.I. OUT OF AUSTIN, TEXAS. THE PARCEL OF MAIL WAS SENT BY FIRST CLASS MAIL AND POST DATED NOV 20TH 2015. NOT ONLY WAS THIS CORRESPONDENCE INTENTIONALLY WITHHELD FOR AN EXTENDED DURATION, BUT ALSO, AFTER PLAINTIFF REVIEWED THE INCLUDED COMMUNICATIONS WHICH STATED ALL OF THE CONTENTS SENT, IT WAS THEN DISCOVERED THAT LISTED DEFENDANTS AND STATE OFFICIALS UNLAWFULLY CONFISCATED A DOCUMENT INCLUDED. THIS UNLAWFUL CONFISCATION WAS COMMITTED WITH ABSOLUTELY NO NOTIFICATION, IN DIRECT VIOLATION OF PLAINTIFF'S RIGHTS.

ACT 20: THIS SERIES OF U.S. MAIL OBSTRUCTIONS INVOLVES LISTED DEFENDANTS AND STATE OFFICIALS UNLAWFUL TAMPERINGS, UNETHICAL WITHHOLDINGS AND SELECTIVE SERVICING OF LEGAL CORRESPONDENCE. THE LISTED DEFENDANTS AND STATE OFFICIALS CONTINUE TO PUT-FORTH STRATEGICALLY CRAFTED AND INSIDIOUSLY CLEVER MAIL WITHHOLDINGS, ALL SET-IN-PLACE IN ORDER TO HINDER AND INTERRUPT PLAINTIFF'S ABILITIES IN THE ONGOING CIVIL LITIGATIONS. THESE ONGOING TRANSGRESSIONS ARE REPETITIVE IN OCCURRENCE, AND PLAINTIFF ONLY CONTINUES TO ENCOUNTER SUCH.

PARCEL ONE, LEGAL MAIL FROM THE OHIO ATTORNEY GENERAL POST DATED DEC 8TH 2015, RECEIVED AND DELIVERED DECEMBER 17, 2015. PARCEL TWO: LEGAL MAIL FROM THE U.S. DISTRICT COURT POST DATED DEC - 9TH 2015 RECEIVED AND DELIVERED DEC 21, 2015.

PARCEL THREE, LEGAL MAIL POST DATED DEC 7, 2015, RECEIVED AND DELIVERED DEC 22, 2015. PLAINTIFF RECITES THESE RECORDED DATES IN THE COMPLAINTS ALLEGATIONS IN ORDER TO SHOW THE COURTS THE UNLAWFUL WITHHOLDINGS AND TIMELY SELECTIVE SERVICING BY THE LISTED DEFENDANTS AND STATE OFFICIALS AND THEIR CALCULATED MANIPULATIONS IN PLAINTIFF'S LEGAL CORRESPONDENCE AND -

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- ACT-20: CIVIL LITIGATIONS... PLAINTIFF CONTINUES TO ENCOUNTER THESE FORMS OF MAIL OBSTRUCTIONS, AND IT IS QUITE APPARENT THAT LISTED DEFENDANTS AND STATE OFFICIALS INTEND TO HINDER AND INTERRUPT PLAINTIFFS LEGAL AFFAIRS WITH VIOLATIONS OF RIGHTS...

ACT 21: THIS PARTICULAR INCIDENT OF U.S. MAIL OBSTRUCTIONS INVOLVES LISTED DEFENDANTS AND STATE OFFICIALS FURTHER UNLAWFUL WITH-HOLDINGS AND SELECTIVE SERVICING OF LEGAL BOOKS... ON DECEMBER 14TH, 2015, WITHIN S.O.C.F. HOUSING UNIT K4- CELL 2, PLAINTIFF RECEIVED SEVERAL LEGAL BOOKS FROM LUCY PARSONS BOOKSTORE... PLAINTIFF, UPON RECEIVING THE ATTACHED INVOICE AND INSPECTING IT, IMMEDIATELY DISCOVERED THAT THE DATE OF ACTUAL SERVICE WAS SEPT. 15, 2015. LISTED DEFENDANTS AND STATE OFFICIALS ONCE AGAIN TIMELY WITH-HELD LEGAL PROVISIONS IN DIRECT VIOLATION OF PLAINTIFFS RIGHTS...

ACT 22: THIS SERIES OF U.S. MAIL OBSTRUCTIONS INVOLVES LISTED DEFENDANTS & STATE OFFICIALS ONGOING AND CONTINUED HINDERING INTERUPTIONS ON BOTH PLAINTIFFS SENT AND RECEIVED PERSONAL COMMUNICATIONS AND MAGAZINE SUBSCRIPTIONS. PLAINTIFF, FOR THE MONTH OF JANUARY 2016, RECEIVED ABSOLUTELY NONE OF THE MAGAZINE SUBSCRIPTIONS NOR PERSONAL MAIL. LISTED DEFENDANT AND RESPONSIBLE STATE OFFICIALS ARE IN FACT DEVIOUSLY AND VINDICTIVELY RE-ROUTING PLAINTIFFS MAIL TO OTHER HOUSING UNITS, SO PLAINTIFF NEVER RECEIVES SUCH, IN DIRECT VIOLATION OF RIGHTS...

ACT 23: THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION PERTAINS TO LISTED DEFENDANTS AND STATE OFFICIALS INTENTIONAL INTERUPTIONS AND CALCULATED INTERFERENCE IN PLAINTIFFS ABILITY IN ACCESSING COURTS WITH DESTRUCTIONS OF A COMPLETE AND SERVICED CIVIL COMPLAINT, WHICH WAS INTENDED FOR THIS COURT. THIS PARTICULAR ACT OF U.S. MAIL OBSTRUCTION, IN AND OF ITSELF -

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO - 31/33

- WESTERN DIVISION -

1:16-CV-487

Jan. 31, 2017

- OCT 23 - CONSIST OF ONE OF THE MORE SEVERE TRANSGRESSIONS, AND IS DIRECTLY IN RELATION TO THIS CIVIL CASE. PLAINTIFF, ON NOV. 13TH, 2015, AT S.O.C.F. did IN FACT SERVICE of 30 plus page CIVIL COMPLAINT TO THIS COURT, CONTAIN BASIC ASSERTIONS SET FORTH IN SEVERAL SECTIONS OF THIS COMPLAINT (PLEASE MAKE REFERENCE - TO CIVIL CASE 1:14-CV-199 GALTNEY v. GROUPED WITH - DOC NO. 159 FILED NOV. 24, 2015). ON NOV. 19, 2015, a MONETARY CASH DEDUCTION WAS INITIATED, WITH a \$5.95 WITHDRAWAL MADE FROM PLAINTIFF'S PERSONAL ACCOUNT FOR POSTAGE IN THE SERVICED CIVIL COMPLAINT. LISTED DEFENDANTS AND STATE OFFICIALS THEN PROCEED TO ISSUE PLAINTIFF'S SERVICED CIVIL COMPLAINT of FRAUDULENT and INVALID POSTAL TRACKING NUMBER, AS SHOWN OF THE CASH WITHDRAWAL SLIP (914 999 4431 7312 47). THIS WAS DONE IN ORDER TO MAKE IT APPEAR AS IF THE PARCEL OF LEGAL MAIL WAS IN FACT SERVICED, WHEN IN ACTUALITY IT WAS NOT. THE LISTED DEFENDANTS AND STATE OFFICIALS did IN FACT OBSTRUCT AND DESTROY PLAINTIFF'S PARCEL OF LEGAL MAIL CONTAINING THE CIVIL COMPLAINT IN DIRECT VIOLATION OF PLAINTIFF'S CONSTITUTIONAL RIGHTS. THE SERVICED CIVIL COMPLAINT NEVER LEFT THIS FACILITY AS THE POST OFFICE HAS ABSOLUTELY NO RECORD OF SUCH, AND SO THE PLAINTIFF WAS FORCED TO REDEPOSIT THE ENTIRE CIVIL COMPLAINT. PLAINTIFF WAS ALSO UNJUSTLY DENIED STATE REMEDIES IN THIS MATTER, BUT did EXHAUST all SUCH THAT WAS AVAILABLE...

PLAINTIFF, FOR all ENCOUNTERS OF CONFINED acts OF U.S. MAIL OBSTRUCTIONS, did IN FACT UTILIZE AND EXHAUST all AVAILABLE STATE ADMINISTRATIVE REMEDY, AS FEDERALLY REQUIRED, AND AS PERMITTED BY LISTED DEFENDANTS AND STATE OFFICIALS... AS TRANSCRIBED IN SOME INSTANCES STATE REMEDY WAS MADE FUNDAMENTALLY UNAVAILABLE. PLAINTIFF REQUEST THE COURTS HOLD DEFENDANTS ACCOUNTABLE FOR all VIOLATIONS OF THE CONSTITUTION...

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO 32/33

- WESTERN DIVISION -

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F. - JUSTIFICATION FOR ACTION -
 - CAUSE FOR CIVIL CASE TO COMPEL -

I. PLAINTIFF CONTENDS THAT THERE REMAINS A WHOLE AMOUNT OF SUFFICIENT JUSTIFICATIONS PRESENT WITHIN THESE CIVIL ASSERTIONS TO SUBSTANTIATE CAUSE IN THIS ACTION TO PROCEED ON THIS VENUE OF JUDICIAL LAW.

II. AS SET FORTH IN STIPULATIONS WITHIN THE CIVIL COMPLAINTS ASSERTIONS, THE PLAINTIFF HAS IN FACT BEEN SUBJECTED TO AND SUFFERED FROM BLATANT VIOLATIONS AND OBLIVIOUS DEPRIVATIONS OF HIS FIRST, EIGHTH, AND FOURTEENTH AMENDMENT RIGHTS. ALL UNCONSTITUTIONAL TRANSGRESSIONS AS TRANSCRIBED, WERE CONSCIOUSLY COMMITTED BY LISTED DEFENDANTS AND STATE OFFICIALS IN A VINDICTIVELY INTENTIONAL FASHION, AND RETALIATORY MANNER.

III. PLAINTIFF, THEREFORE, AS A PROUD CITIZEN OF THE UNITED STATES OF AMERICA, COMES BEFORE THE HONORABLE DISTRICT COURTS FOR THE SOUTHERN DISTRICT IN THE WESTERN DIVISION TO RIGHTFULLY EXERCISE PROCEDURAL ENTITLEMENTS BY EXTENDING PURSUITS IN CIVIL LITIGATIONS FOR ALL CONSTITUTIONAL VIOLATIONS AND DEPRIVATIONS, RAISING SUCH IN THE PROPER AND APPROPRIATE VENUE OF LAW. PLAINTIFF AS RIGHTFULLY ENTITLED COMES BEFORE THE HONORABLE COURTS TO PETITION THE JUDICIAL CHAMBERS TO THEREFORE PETITION FOR ELIGIBLE RELIEF, REMEDY AND REDRESS, AS DETERMINE TO BE JUST AND FAIR. PLAINTIFF CONTINUES TO SUFFER GROSSLY UNCONSTITUTIONAL INFLICTIONS AS ASSERTED WITHIN THIS CIVIL COMPLAINT. PLAINTIFF ASK THE COURTS TO APPLY ITS JUDICIAL DISCRETIONS AND INTERPRETATIONS TO ALL SUBJECT MATTER DURING EXAMINATIONS.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO

33/33

WESTERN DIVISION

1:16-CV-487

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C. PRAYER FOR RELIEF & REDRESS

1. WHEREFORE THE PLAINTIFF EMPLORES UPON THE HONORABLE COURTS REQUESTING THAT:

A. DECLARE THAT THE ACTS COMMITTED AND THE OMISSIONS ASSERTED WITHIN THE COMPLAINT'S INSCRIPTIONS ARE IN FACT IN DIRECT VIOLATION OF PLAINTIFF'S CONSTITUTIONAL RIGHTS...

B. Order all DEFENDANTS and RESPONSIBLE STATE OFFICIALS TO OFFER MONETARY COMPENSATORY and PUNITIVE DAMAGES, AS SEEN JUST and FIT...

C. Order all DEFENDANTS and RESPONSIBLE STATE OFFICIALS TO PAY NOMINAL DAMAGES.

D. Order all DEFENDANTS and RESPONSIBLE STATE OFFICIALS TO PAY and OFFER all ATTORNEY FEES, LITIGATION and COURT COSTS - and, -

E. Grant any and all just EQUITABLE JUDICIAL RELIEF THAT THE COURTS MAY DETERMINE and DEEM FIT as a MATTER OF CONSTITUTIONAL LAW.

RESPECTFULLY SUBMITTED:

EXECUTED AND ENDORSED:

January 31, 2017

Jeremy P. Gallant
 JEREMY P. GALLANT
 NO. 624-283 - S.O.C.F.
 P.O. Box 45699
 LUCASVILLE, OH 45699

I, JEREMY P. GALLANT, PURSUANT TO 28 U.S.C. § 1746 DO DECLARE and Legally affirm under PAINS and PENALTIES OF PERJURY THAT ALL TRANSCRIPTIONS and CONSTITUTIONAL ASSERTIONS CONTAIN TRUTH & FACT. THIS I DO SWEAR and AFFIRM IN A COURT OF LAW...

UNITED STATES DISTRICT COURTS SOUTHERN DISTRICT OF OHIO

~ WESTERN DIVISION ~

JEREMY P. GALLANT

NO. 624-283 - S.O.C.F.

P.O. Box 45699

LUCASVILLE OH 45699

CASE

1:16-cv-487

JANUARY 31, 2017

SCIOTO COUNTY, OHIO

II

MR. GALLANT

ET AL

DEFENDANTS

APPENDIX - SECTIONALIZED SEGMENTS / VERIFIED AMENDED CIVIL COMPLAINT

I. THE FOLLOWING INSERTS CONTAIN RECITINGS OF THE INDIVIDUAL SEGMENTS OF SECTIONALIZED ASSERTIONS INCLUDED IN THE VERIFIED AMENDED COMPLAINT.

THIS IS DONE IN ACCORDANCE WITH LOCAL RULE 7.2 (7)(3) "MOTIONS AND OTHER PAPERS".

I. INTRODUCTION ~ pg 1-2, paragraphs 1-III

II. SEC A. PROSPECTIVE DEFENDANTS ~ pg 2 ~ paragraphs I-II

III. SEC B. EXHAUSTION OF STATE REMEDY ~ pg 3 ~ paragraphs I-II

IV. SEC C. "CONSTITUTIONAL ASSERTIONS" pg 3 ~ paragraphs I

V. SEC C. SEG A. "PREJUDICIAL PERJURY" ~ pg 3-5 ~ paragraphs I-XI

VI. SEC C. SEG B. "ACTS OF RETALIATION" pg 6-8 ~ paragraphs I-XVII

VII. SEC C. SEG B. "MEDICAL INDIFFERENCE" pg 9-14 ~ paragraphs I-XX-IV

VIII. SEC C. SEG C. "RETALIATIONS" pg 14-17 paragraphs 1-15

IX. SEC C. SEG D. "RETALIATIONS" ~ pg 18-20 paragraphs I-XIII

X. SEC C. SEG E. "RETALIATIONS" ~ pg 21-31 paragraphs I-II-1-23

XI. SEC C. SEG F. "JUSTIFICATION FOR ACTION" pg 32 ~ paragraphs I-III

XII. SEC C. SEG G. "PRAYER FOR RELIEF" pg 33 ~ paragraphs I-1-E